

EXHIBIT 7

Trademark Trial and Appeal Board Electronic Filing System. <http://estta.uspto.gov>ESTTA Tracking number: **ESTTA455729**Filing date: **02/09/2012**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Raj Abhyanker		
Entity	Individual	Citizenship	UNITED STATES
Address	1580 W EL CAMINO REAL STE 8 MOUNTAIN VIEW, CA 94040 UNITED STATES		

Attorney information	Christopher Ditico Raj Abhyanker PC 1580 W EL CAMINO REAL STE 8 MOUNTAIN VIEW, CA 94040 UNITED STATES trademarks@rajpatent.com, cdditico@rajpatent.com, disputes@rajpatent.com Phone:650-965-8731
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Applicant Information

Application No	85236918	Publication date	01/10/2012
Opposition Filing Date	02/09/2012	Opposition Period Ends	02/09/2012
Applicant	NEXTDOOR.COM, INC. 110 Sutter Street, Suite 700 SAN FRANCISCO, CA 94104 UNITED STATES		

Goods/Services Affected by Opposition

Class 009. All goods and services in the class are opposed, namely: Computer software, namely, computer software for creating private networks and communities; computer software providing a communications platform enabling users to create private networks and online communities based on geographic locations; Software to enable uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information over the Internet or other communications network; Computer software development tools for social networking, building social networking applications and for allowing data retrieval, upload, access and management; computer software application programming interface (API) for third-party software and online services for social networking, building social networking applications and for allowing data retrieval, upload, access and management
Class 035. All goods and services in the class are opposed, namely: Advertising services; Advertising and information distribution services, namely, providing classified advertising space via the global computer network; promoting the goods and services of others over the Internet; providing on-line computer databases and on-line searchable databases in the field of classifieds; Online service for connecting social network users with retailers for the purpose of facilitating discounted purchases
Class 038. All goods and services in the class are opposed, namely: Electronic transmission of instant

messages and data; Chat room services for social networking; Providing on-line chat rooms for social networking; Providing online chat rooms and electronic bulletin boards for registered users for transmission of messages concerning local communities, news, and events, topics of general interest, classifieds, virtual community, social networking, photo sharing, and transmission of photographic images; provision of on-line forums for the transmission of photographic images and audio/video content; provision of on-line forums for communications on topics of general interest; providing access to computer databases featuring pre-populated and user-generated information related to topics of general interest

Class 042.

All goods and services in the class are opposed, namely: Computer services, namely, online non-downloadable software which allows users to create on-line communities related to shared geographic boundaries, common interests, and local events and activities; Computer services, namely, creating an on-line community; computer services, namely, hosting online web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; computer services in the nature of customized web pages featuring user-defined information, personal profiles and information; computer services, namely, creating an on-line community for registered users to participate in discussions, get feedback from their peers, form virtual communities, and engage in social networking; Providing a website that gives users the ability to review various print, photographic, graphic image, and audio and video content and utilize a custom template to provide input, likes, dislikes, edits, changes, modifications, opinions, suggestions, and comments and engage in social and community networking; Providing temporary use of non-downloadable software applications for classifieds, virtual community, social networking, photo sharing, and transmission of photographic images. Computer services, namely, providing search platforms to allow users to request content from and receive content to a mobile device; Providing customized on-line web pages featuring user-defined information, which includes blog posts, new media content, other on-line content, and on-line web links to other websites

Class 045.

All goods and services in the class are opposed, namely: Hosting an online community website featuring shared communications between community members; Internet based introduction and social networking services; providing on-line computer databases and on-line searchable databases in the field of social, community and local networking

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
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Marks Cited by Opposer as Basis for Opposition

U.S. Application No.		Application Date	
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	NONE		
Design Mark			
Description of Mark	NONE		
Goods/Services			

U.S. Application/Registration No.	NONE	Application Date	NONE
Registration Date	NONE		
Word Mark	FATDOOR		
Goods/Services	Computer services in the nature of customized web pages featuring user-defined information, personal profiles and information, namely, providing location tagged profiles using spatial and geo-coded information through the Internet; Computer services, namely,		

	<p>providing a specialized search engine for finding personal, geographical and business data on a global network; Computer software; computer software for creating private networks and communities; computer software providing a communications platform enabling users to create private networks and online communities based on geographic locations; Software to enable uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information over the Internet or other communications network; Computer software development tools for social networking, building social networking applications and for allowing data retrieval, upload, access and management; application programming interface (API) for third-party software and online services for social networking, building social networking applications and for allowing data retrieval, upload, access and management; Advertising services; Advertising and information distribution services, namely, providing classified advertising space via the global computer network; promoting the goods and services of others over the Internet; providing on-line computer databases and on-line searchable databases in the field of classifieds; Online service for connecting social network users with retailers for the purpose of facilitating discounted purchases; Providing access to computer databases; electronic transmission of instant messages and data; Chat room services for social networking; Providing on-line chat rooms for social networking; Providing online chat rooms and electronic bulletin boards for registered users for transmission of messages concerning local communities, news, and events, topics of general interest, classifieds, virtual community, social networking, photo sharing, and transmission of photographic images; provision of on-line forums for the transmission of photographic images and audio/video content; provision of on-line forums for communications on topics of general interest; On-line journals, namely, blogs featuring user-defined content; Electronic publishing services, namely, publishing of online works of others featuring user-created text, audio, video, and graphics; providing on-line journals and web logs featuring user-created content; Computer services; online non-downloadable software; Computer services, namely, creating an on-line community; computer services, namely, hosting online web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; computer services in the nature of customized web pages featuring user-defined information, personal profiles and information; computer services, namely, creating an on-line community for registered users to participate in discussions, get feedback from their peers, form virtual communities, and engage in social networking; Providing a website that gives users the ability to review various print, photographic, graphic image, and audio and video content and utilize a custom template to provide input, likes, dislikes, edits, changes, modifications, opinions, suggestions, and comments and engage in social and community networking; Providing temporary use of non-downloadable software applications for classifieds, virtual community, social networking, photo sharing, and transmission of photographic images. Computer services, namely, providing search platforms to allow users to request content from and receive content to a mobile device; Hosting an online community website featuring shared communications between community members; Internet based introduction and social networking services; providing on-line computer databases and on-line searchable databases in the field of social, community and local networking</p>
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Attachments	2012-02-09-TTAB-FATDOOR-FINAL.pdf (8 pages)(230021 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/Christopher Ditico/
Name	Christopher Ditico
Date	02/09/2012

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of Trademark Serial No. 85236918
For the mark NEXTDOOR Published for Opposition on January 10, 2012

Raj Abhyanker Opposer Vs Nextdoor.com, Inc. Applicant	Opposition No. MARK: NEXTDOOR Serial No. 85236918
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NOTICE OF OPPOSITION

In the matter of U.S. Trademark Application Serial No. 85236918, filed on February 8, 2011 by Nextdoor.com, Inc. (“Applicant”), and published for opposition in the January 10, 2012 issue of the Official Gazette of the United States Patent and Trademark Office, for the trademark and service mark NEXTDOOR as applied to all goods and services listed in International Classes 9, 35, 38, 42, and 45 (the “Infringing Application”).

Raj Abhyanker, an individual and citizen of the United States maintaining a principal address at 1580 W. El Camino Real, Suite 8, Mountain View, CA 94040 (“Opposer”), believes that he will be damaged by the registration of the NEXTDOOR mark (the “Infringing Mark”) and hereby opposes the same.

As grounds for the cancellation, Opposer, by and through his attorneys, alleges as follows:

FACTS COMMON TO ALL CLAIMS

1. Opposer is an individual and citizen of the United States, with a principal address at 1580 W. El Camino Real, Suite 8, Mountain View, CA 94040.

2. Opposer is the owner of the pending United States trademark application for the stylized character mark FATDOOR GET TO KNOW YOUR NEIGHBORS (US Serial No. 85537718), filed on 02/08/2012 for goods and services in International Class 42. This application is live and pending.

3. Upon information and belief, Applicant is a corporation formed under the laws of Delaware, having its principal place of business at 110 Sutter Street, Suite 700, San Francisco, CA 94104.

4. Applicant is currently the owner of United States Trademark Application Serial No. 85236918 (hereinafter “the Infringing Application”), for the mark NEXTDOOR (hereinafter “the Infringing Mark”), for the following listed goods and services: “Computer software, namely, computer software for creating private networks and communities; computer software providing a communications platform enabling users to create private networks and online communities based on geographic locations; Software to enable uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information over the Internet or other communications network; Computer software development tools for social networking, building social networking applications and for allowing data retrieval, upload, access and management; computer software application programming interface (API) for third-party software and online services for social networking, building social networking applications

and for allowing data retrieval, upload, access and management” in International Class 9;

“Advertising services; Advertising and information distribution services, namely, providing classified advertising space via the global computer network; promoting the goods and services of others over the Internet; providing on-line computer databases and on-line searchable databases in the field of classifieds; Online service for connecting social network users with retailers for the purpose of facilitating discounted purchases” in International Class 35;

“Electronic transmission of instant messages and data; Chat room services for social networking; Providing on-line chat rooms for social networking; Providing online chat rooms and electronic bulletin boards for registered users for transmission of messages concerning local communities, news, and events, topics of general interest, classifieds, virtual community, social networking, photo sharing, and transmission of photographic images; provision of on-line forums for the transmission of photographic images and audio/video content; provision of on-line forums for communications on topics of general interest; providing access to computer databases featuring pre-populated and user-generated information related to topics of general interest” in International Class 38; “Computer services, namely, online non-downloadable software which allows users to create on-line communities related to shared geographic boundaries, common interests, and local events and activities; Computer services, namely, creating an on-line community; computer services, namely, hosting online web facilities for others for organizing and conducting online meetings, gatherings, and interactive discussions; computer services in the nature of customized web pages featuring user-defined information, personal profiles and information; computer services, namely, creating an on-line community for registered users to participate in discussions, get feedback from their peers, form virtual communities, and engage in social networking; Providing a website that gives users the ability to review various print,

photographic, graphic image, and audio and video content and utilize a custom template to provide input, likes, dislikes, edits, changes, modifications, opinions, suggestions, and comments and engage in social and community networking; Providing temporary use of non-downloadable software applications for classifieds, virtual community, social networking, photo sharing, and transmission of photographic images. Computer services, namely, providing search platforms to allow users to request content from and receive content to a mobile device; Providing customized on-line web pages featuring user-defined information, which includes blog posts, new media content, other on-line content, and on-line web links to other websites” in International Class 42; and “Hosting an online community website featuring shared communications between community members; Internet based introduction and social networking services; providing on-line computer databases and on-line searchable databases in the field of social, community and local networking” in International Class 45.

5. The Infringing Mark as filed in the Infringing Application is confusingly similar to the word mark as specified in Opposer’s pending application Serial No. 85537718. The Infringing Application also lists goods and services that are in part identical to Opposer’s listed goods and services in Serial No. 85537718.

6. Due to the similarities in Opposer’s ‘718 application and the Infringing Application outlined herein, it is likely that Opposer’s pending ‘718 application will receive a Section 2(d) refusal and/or Suspension Notice citing to the Infringing Application.

7. Thus, Opposer will be damaged by the registration of the Infringing Application because that application is blocking Opposer’s pending application Ser. No. 85537718.

COUNT I – PRIORITY/LIKELIHOOD OF CONFUSION

8. Opposer repeats and realleges the allegations of the preceding Paragraphs as if fully set forth herein.

9. Opposer has been using the word mark FATDOOR and design mark FATDOOR GET TO KNOW YOUR NEIGHBORS (collective known as “FATDOOR mark”) in commerce in connection with goods and services involving the use of proprietary geo-spatial software and technology, including but not limited to geo-spatial databases, architecture, social networking, friend grouping, real time updates, feed aggregation, spheres of influence, application technologies associated with aggregate, filtering of relevant feeds across multiple networks, filtering conversations across cross group interactions, providing of in depth conversations through a social graph, editable user pages, community governance, neighborhood communication and geo-spatial social networking (hereafter “The Nextdoor/Fatdoor concept”), since as early as October 25, 2006 and at least from April 15, 2008 through the filing of this Opposition.

10. The Nextdoor/Fatdoor concept was originally developed by Opposer on or about August 2005. At that time, Opposer was surprised by the lack of web based tools available to aggregate and organize information about friends in social networks, manage large amounts of user connections, determine relevancy from large amounts of social network connected content, provide real time updates, organize information related to social connections, create walking maps of neighborhoods, aggregate and filter relevant feeds across multiple networks, filter conversations across cross group interactions, provide in depth conversations through a social graph, and to annotate information regarding neighbors around a particular residence. Opposer initially developed the Nextdoor/Fatdoor concept as a mash up of maps created using MapQuest and a Wikipedia style entry page for each neighbor that he met. A conception document was first

prepared on or about August 21, 2005 and clearly included the NEXTDOOR mark. Particularly, the document was titled: “NextDoor.com Specification Draft 1 - August 21, 2005 ‘Get to know your neighbors.’”

11. The conception document contained several paragraphs including: “What we are trying to create is a way to create a way for neighbors to get to know each other and their surrounding businesses more easily through the Internet. The UI of the site will have a map of your home with a social networking page pop up on the right when one clicks a particular home/location. There will be no information about prices of a home, no information about the number of bedrooms of a home, etc. People will be the focus, not the real estate.”

12. Opposer intended to purchase the “www.nextdoor.com” domain name. Due to issues with procuring the “www.nextdoor.com” domain, Opposer instead used the name FATDOOR as a second preference until the “www.nextdoor.com” domain could be acquired.

13. Opposer owns the domains “www.fatdoore.com” and “fatdore.com,” and incorporated websites, both of which describe and continue to describe the FATDOOR mark and focus on neighborhood social networking. Both domains were originally purchased on or about November 10, 2006. Opposer continues to own both domains as of the filing of this Opposition. In addition, Opposer recently registered the domain name “www.fatdoor.us”, and currently operates a live commercial website promoting Opposer’s technology services as alleged herein, under the FATDOOR mark.

14. Goods and services provided under the FATDOOR mark have been widely advertised to the purchasing public and the trade in the United States of America.

15. Opposer has expended considerable time, effort, and financial resources building and marketing the FATDOOR mark and brand. As a result thereof, the FATDOOR mark and the goodwill associated therewith are of inestimable value to Opposer.

16. The Infringing Application is currently a 1(b) intent-to-use application indicating that Applicant has yet to use the NEXTDOOR mark in commerce. The Infringing Application was filed on February 8, 2011.

17. Opposer has been using the FATDOOR mark in commerce in relation to the technology services alleged herein for a longer period of time and prior to Applicant's use of NEXTDOOR for the services listed in the Infringing Application.

18. Applicant's registration and/or use of the NEXTDOOR mark, in view of Opposer's rights in the FATDOOR mark, is likely to cause confusion, to cause mistake or to deceive.

19. Upon information and belief, Applicant was well aware of Opposer's FATDOOR mark prior to filing the Infringing Application, and selected the NEXTDOOR mark with the specific intent to create confusion.

Accordingly, it is Opposer's belief that if Applicant is allowed to obtain registration for the opposed mark herein, Opposer will suffer irreparable harm and damage.

Date: February 9, 2012

Respectfully submitted,

/Chris Ditico/
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CERTIFICATE OF MAILING AND SERVICE

I certify that on February 9, 2012, the foregoing **NOTICE OF OPPOSITION** are being served by email, facsimile, and mailing a copy thereof by first-class postage pre-paid mail addressed to:

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